

1 J. BRUCE ALVERSON, ESQ.

Nevada Bar No. 1339

2 KARIE N. WILSON, ESQ.

Nevada Bar No. 7957

3 **ALVERSON TAYLOR**

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6 Attorneys for Defendants

7 UNITED STATES DISTRICT COURT

8 FOR THE DISTRICT OF NEVADA

9 JIMMY PETERSON, individually, and as
Guardian ad Litem for CHARLOTTE-MARIE-
10 SMITH-PETERSON, a minor,

11 Plaintiffs,

12 v.

13 TELICIA DA'SHANEE HALL, an individual;
NEW PRIME, INC., a Foreign Corporation; and
14 DOES I through X, inclusive

15 Defendants.

CASE NO: 2:17-cv-01860-JCM-CWH

STIPULATION AND
ORDER TO REMAND TO NEVADA
STATE COURT

17 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, JIMMY
18 DEAN PETERSON, individually, and as Guardian ad Litem for CHARLOTTE-MARIE
19 SMITH-PETERSON, and Defendant NEW PRIME, INC., by and through their respective
20 counsel of record that this matter be remanded to the Eighth Judicial District Court for Clark
21 County, Nevada. This stipulation is based upon representations and assurances by Plaintiffs that
22 their alleged damages and injuries do not meet the \$75,000.00 jurisdictional minimum for
23 removal to federal court.

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IT IS FURTHER STIPULATED AND AGREED that once remanded to the Eighth Judicial District Court for Clark County, Nevada, Plaintiffs will not seek to remove the case from the Nevada Mandatory Arbitration Program, which provides a limit on damages of \$50,000.00.

By entering into this stipulation, Defendant New Prime, Inc. neither acknowledges nor concedes any liability with respect to any claims brought by Plaintiffs in their Complaint, whether original or as may be amended.

Dated this 3rd day of August, 2017.

Dated this 3rd day of August, 2017.

ALVERSON, TAYLOR
MORTENSEN & SANDERS

LAW OFFICES OF STEVEN M. BURRIS



/s/ Steven M. Burris

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(PROPOSED) ORDER TO REMAND

IT IS HEREBY ORDERED that this case be remanded to the Eighth Judicial District Court for the County of Clark, State of Nevada, Case No. A-17-756486-C.

DATED August 4, 2017.


U.S. DISTRICT COURT JUDGE

Respectfully submitted by:

ALVERSON, TAYLOR
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